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United States Bankruptcy Court Eastern District of Pennsylvania

In re:	Case No. 23-13908-mdo
Elizabeth Algarin,	Chapter 7
Debtor.	

Debtor's Motion to Convert Case from Chapter 7 to Chapter 13

AND NOW, Debtor Elizabeth Algarin, by and through her attorney, moves this Court to convert this chapter 7 case to a case under chapter 13. In support of this motion, the Debtor states as follows:

- 1. The Debtor filed this case under chapter 7 on December 28, 2023.
- 2. The interim trustee in this case is Robert W. Seitzer.
- 3. This case has not been converted previously under 11 U.S.C. §1112, §1208, or §1307. See 11 U.S.C. § 706(a).
 - 4. The Debtor hereby requests that this case be converted to a case under chapter 13.
- 5. To prevent any ambiguities, the Court's order converting the case must state that the Debtor's first payment to the chapter 13 trustee will be due within 30 days of the order granting relief under chapter 13.
 - 6. The Court may issue an order on this motion without a hearing. L.B.R. 1017-1.

NOW, THEREFORE, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in her favor as may be necessary and proper under the law.

Date: January 16, 2024 CIBIK LAW, P.C. Counsel for Debtor

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